1050 E. 3300 South Suite 205
Salt Lake City, UT. 84093

Compliance Letter

Federal Communications Comm.
445 12th St. S.W.
Washington, D.C. 20554

Dear Sirs,

Please consider this our compliance letter required in WC Docket No. 05-196.

911 Solution :
We have ported 91% of our current customers to Electric Lightwave who is a CLEC providing E911 in the Salt Lake City, Provo, and Ogden, Utah areas. Currently we service business customers only and do not allow nomadic use of our service. The other 9% utilize the Intrado 911 network out of Denver CO.
The V9-1-1™ solution enabled by Telefinity Dash911 through Intrado provides a true E9-1-1 solution for VoIP Service Providers. The solution provided by the Telefinity Dash911 affiliation with Intrado enables a comprehensive approach to delivering E9-1-1 for VoIP by handling all aspects of the VoIP 9-1-1 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service for the VSP is also the call delivery component to ensure the 9-1-1 call reaches the appropriate selective router and Public Safety Answering Point (PSAP). Specifically, Intrado manages the VPC functionality and the Call Delivery component on behalf of Telefinity Dash 911. .

We submit address and telephone number information to Telefinity Dash911 via a real-time interface and have PSTN connectivity to the Telefinity Dash911 network to enable live 9-1-1call delivery. The real-time interface is via a SOAP API programming interface supplied by Telefinity Dash 911 to us

911 Routing Information/Connectivity to Wireline E911 Network:

Currently through the assistance of our Network providers, each of IP Telesis' VSP customers will have access to 154 E9-1-1 Selective Routers by November 28th, 2005 and the attached "Major Market Deployment Map" and the "VoIP Deployment Plan" reflects the major market deployment schedules. Note: the market deployment map represent major markets where Intrado has reported to Telefinity Dash911 that it has connectivity to at least 1 selective router, ALI steering and the ability to populate ALI.

Transmission of ANI and Registered Location Information:

Basic PSAP: Currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router. To illustrate PSAPs within the US, which are not served by a Selective Router, the enclosed "Basic 9-1-1 PSAP" map could be used as reference information. While these areas are not included within the FCC Order and are not required for compliance, Intrado reports that they are actively contacting these areas to determine technical options for VoIP E9-1-1 native call delivery

ANI Only: There are unique deployment circumstances in areas of the US and Puerto Rico that operate off E9-1-1 Selective Routers, but will not meet the full FCC mandate.

Telefinity Dash911 has indicated that Intrado has noted that there are currently four (4) States and a Territory that will have native Selective Routing functionality but will only provide Automatic Number Identification (ANI) only service to the PSAP. The following information explains the circumstances within these areas:

Deployment Overview – IP Telesis (The Telefinity Dash 911 E911 solution) uses Intrado as a backbone supplier and as such Intrado is the VPC and is working on nationwide native VoIP E9-1-1 delivery in accordance with the Commission Order. The initial PSAP deployments are targeted in major metropolitan areas throughout the US based on the VSP customer subscriber base priorities. The attached *"Major Market Deployment Map",* which corresponds with MSAs, identifies regions within our subscriber territory that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. Telefinity Dash 911 has advised us that these areas are planned for deployments by November 28, 2005; March 31, 2006 and June 30, 2006. This intention of this map is to demonstrate FCC compliance for the November 28th requirements and the future deployment strategy.

Obtaining Initial Registered Location Information :
Please find attached the ELI PSALI multi-address update form used in obtaining initial registration location information. We also provide a website to update information for customers outside on Utah through an Intrado reseller, Telefinity out of Denver Co.

Obtaining Updated Registered Location Information:
Customers are required to update their information via our website. Their equipment will not function without a data update that is only available through our support desk.
IP Telesis (Telefinity Dash 911), as part of our total 9-1-1 solution, provides at least one way of updating each subscriber's Registered Location. As a component of the Telefinity Dash911 Service we have access to a near real-time address update system provided to us by Telefinity Dash911. This allows us to have near real-time delivery of the subscriber's address and also allows us as a VSP to submit a subscriber's address update information directly. The system allows us to have the subscriber input his initial address into the system at the time of initially signing up for our VoIP service. Addresses submitted are subjected to an immediate screening against the US Postal Service Street

Address Guide in order to immediately determine if the submitted address is a valid address. IP Telesis may integrate VUI into their existing provisioning systems to ensure seamless delivery of acquired registered location information to the Intrado systems.

Subscirbers have more than one option to input, update or change their address. Subscribers can easily and quickly update their Registered Location by either (a) online via our website, or (b) use the Telefinity Dash911 telephone touch tone (IVR) system to either select another pre-registered address that the subscriber may already have on file, or to ask for an operator who will make the address change while the customer is on the phone.

At the time of an emergency VoIP 9-1-1 call, Telefinity Dash 911 passes the call directly to Intrado's call routing system. Intrado's call routing system uses the customer's provisioned information to associate the latitude and

longitude assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid Address and Call Back Number of the user.

(Telefinity Dash 911) also offers us, a newly-released product called "Level of Service (LoS) Query" that enables us to make a real-time query with an address of a customer/end user for the purpose of determining the level of 9-1-1 service available to that customer based on their location. Intrado will return a set of responses (Enhanced, Basic, etc.) that will enable us or our user to determine the level of 9-1-1 service available at that address and take appropriate action.

Technical Solution for Nomadic Subscribers:

As a VSP using Telefinity Dash911's E911 for VoIP service, we are able to route VoIP emergency calls from our VoIP network to Telefinity Dash 911's Intrado Network or alternative 3rd party network for delivery to the appropriate Selective Router and then on to the geographically appropriate Public Safety Answering Point (PSAP) via the native 9-1-1 infrastructure. The Services utilized provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers (TNs) to the most geographically appropriate PSAP. The V9-1-1 solution enables full support of nomadic usage of VoIP provided the user updates their address information upon connecting to the Interenet at a new location/address. Through the Telefinity Dash 911 interface, the 9-1-1 solution will enable the near real-time provisioning (Geocoding and MSAG Validation) of the newly-provisioned address and make available (assuming no errors) that particular user's information for delivery to the PSAP within an average of 15 minutes of receipt of the new Registered Location address information.

We recognizes the universal desire to remove the user interaction and self-provisioning component of the current 9-1-1 solution. To that end, we understand that Telefinity Dash 911, along with Intrado, are actively working a number of "location determination" technologies.